

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

SHANNON PHILLIPS,

*Plaintiff,*

v.

STARBUCKS CORPORATION  
d/b/a STARBUCKS COFFEE  
COMPANY

*Defendant.*

CIVIL ACTION NO.: 2:19-cv-19432

Hon. Joel H. Slomsky, U.S.D.J.

**PLAINTIFF'S MOTION TO PRECLUDE DEFENDANT FROM  
CALLING MICHAEL ROSE AND ANGELA GRASS AS TRIAL WITNESSES**

Pursuant to Fed. R. Civ. P. 37, Plaintiff, Shannon Phillips, by and through her undersigned counsel, hereby moves this Court for an Order precluding Defendant, Starbucks Corporation d/b/a Starbucks Coffee Company ("Starbucks" or "Defendant"), from calling Michael Rose and Angela Grass to testify at trial.

In support of this Motion, Plaintiff relies on the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,

**CONSOLE MATTIACI LAW, LLC**

Dated: May 15, 2023

By: /s/ Katherine C. Oeltjen  
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